

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

Philadelphia Division

LaVerne L. Poussaint

Case No. _____

(to be filled in by the Clerk's Office)

*Plaintiff(s)**(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)***-v-**

Eliezer R. Mendlowitz (Eli Mendlovitz)

and

Evergreen Communities Senior Living, LLC

*Defendant(s)**(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)***COMPLAINT AND REQUEST FOR INJUNCTION****I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	LaVerne L. Poussaint
Street Address	1705 Locust Street Unit 217
City and County	Norristown (Montgomery)
State and Zip Code	Pennsylvania 19401
Telephone Number	484.756.0703
E-mail Address	rittenhouserresidential@gmail.com

B. The Defendant(s)Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	Eliezier Mendlovitz (Eli Mendlowitz)
Job or Title <i>(if known)</i>	Landlord
Street Address	35 East 8th Street
City and County	Lakewood (Ocean)
State and Zip Code	New Jersey 08701-1902
Telephone Number	(732) 901-4117
E-mail Address <i>(if known)</i>	office@evergreen-communities.net

Defendant No. 2

Name	Evergreen Communities Senior Living, LLC
Job or Title <i>(if known)</i>	dba Rental Management, LLC
Street Address	333 Clearfield Avenue
City and County	Trenton (Mercer)
State and Zip Code	New Jersey 08618-0861
Telephone Number	(609) 396-0200
E-mail Address <i>(if known)</i>	office@mytrentonhome.com

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

84 Stat. 922; 18 USC §§ 1961-1968; 26 USC § 679; 31 USC § 5336; 31 CFR § 1010.230; 31 USC 5318(h); 68 PS §250.511 and §250.512; 26 USC §42; 42 USC §1985; 28 USC §1343; 28 USC §1331; 28 USC §1332; 28 USC §343; 28 USC §367; 24 CFR §245.310 - 245.315; 24 CFR §245.15; 24 CFR 982.308(g)(4); 24 CFR 982.309(a)(3); 24 CFR 982.507(a)(2)(i); 24 CFR 888.113; 42 USC §1437f; 42 USC §12101; 29 USC §701; §504 of the Rehabilitation Act

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* LaVerne L. Poussaint, is a citizen of the State of *(name)* Pennsylvania.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* Eliezer R. Mendlowitz (Eli Mendlovitz), is a citizen of the State of *(name)* New Jersey. Or is a citizen of *(foreign nation)* Israel.

b. If the defendant is a corporation

The defendant, (name) Evergreen Communities Senior Living, L, is incorporated under the laws of the State of (name) New Jersey, and has its principal place of business in the State of (name) New Jersey.
 Or is incorporated under the laws of (foreign nation) _____,
 and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

1705 Locust Street Norristown, PA 19401; cybersphere (LinkedIn, Microsoft Teams, Facebook, et cet)

B. What date and approximate time did the events giving rise to your claim(s) occur?

1. For tax evasion purposes, Mendlowitz's attorneys, accountants, and regional operations manager, Dovi Goldbrenner, run his criminal enterprise along the Russian mafiya-type daisy chain business model with each apartment unit operating as its own discrete money-laundering company, calculated (with the help of fintech, proptech, and cryptocurrency apparati), to generate a certain % of profits to sufficiently satisfy Mendlowitz's stateside and foreign stakeholders.

2. In April of 2024, I received an irregular recertification communiqué from one of Mendlowitz's New Jersey operations.

C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

1. Against the backdrop of a deeply-ensconced criminogenic environment that is notoriously the real estate / construction / developer complex, Pennsylvania's already incorrigibly corrupt HUD landscape now hosts the RICO-level racketeer Eli Mendlowitz and his Lakewood cabal within LIHTC's corrosive fiscal ecosystem.

2. With malevolent avarice, Mendlovitz has expanded his transnational, 60+ LLCs empire to penetrate the corridors of profiteering power within my domicile of Norristown - insidiously insinuating himself and his posse within the municipal infrastructure of Montgomery and Delaware Counties, finally accomplishing the total cartelization of the "affordable housing" industry.

3. It is this clandestine contingent with whom I do battle daily in my senior housing residence.

4. It is Mendlowitz's management teams who conveyed racial steering relocation emails and transmitted

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

The absolute abuse of power and savage inhumanity giving rise to forced relocation, displacement, manufactured dislodging, disequilibrium, and dispossession are immeasurable and well nigh insurmountable at this age and stage of my life. Such malevolent machinations must be deep-checked within the residential tenant industry.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Complainant is seeking \$10,100,000 (Ten Million USD) with which she can escape LIHTC hell in which abounds fraud, embezzlement, kickbacks, graft, cronyism, proptech improprieties, fintech manipulations, and samesuch.

Later this morning - after I scribe this predawn plea - I expect another knock on my door - that of the Sheriff.

Let it not be so: I urgently request that a halt be placed on all eviction processes for one year; and ask also that a Writ of Mandamus be issued to the MCHA to continue HAP contracts on my unit until such time that I can transition with all due deliberateness and dignity.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/08/2024

Signature of Plaintiff

LaVerne Poussaint

Printed Name of Plaintiff

LaVerne Poussaint

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address